

----- Message from "Schwarzkopf Robert (TT-AC/PRM)" <Robert.Schwarzkopf@us.bosch.com> on Wed, 6 Apr 2011 20:53:43 +0000 -----

To: "mostefficient@energystar.gov"
<mostefficient@energystar.gov>

Subject: Top Tier Program Comments - Geothermal

To whom it may concern,

FHP Manufacturing is a manufacturer of water to air and water to water geothermal heat pumps based out of Fort Lauderdale, Florida. As a member of the geothermal industry and an Energy Star partner, FHP Manufacturing has been pleased with the progress of the Energy Star program and the proposal of the Top Tier program. We do, however, have two concerns regarding the proposed language of the program:

1 – We feel that the capacity limits set for geothermal heat pumps in the Top Tier program should match the requirements of the geothermal Energy Star program – limits should be based upon voltage to assure that only residential products are covered. Note that it is not uncommon for larger home to employ water to air units above 65k BtuH and water to water units as large as 120k BtuH that employ a single phase power supply. These products, if they represent to best of the best, should be eligible for recognition.

2 – We would like to see clarification of item 3 of the geothermal requirements stating that products must be enabled to communicate digitally with an appropriate thermostat or other control, with the ability to send commissioning information such as model number and diagnostic information, or we would like to see this provision removed. If this communication is to be digital, does it need to conform to a specific protocol? Can other methods of communication also qualify such as diagnostic codes that can be displayed by a thermostat or other device?

We feel that item 3 as stated is too vague and may lead to confusion as to what type of system qualifies.

Thank you for the work thus far on Top Tier and we look forward to seeing the final version.

Best regards,

BeQIK

**Robert Schwarzkopf
TT-AC/PRM**